

2024V00579/PAL/jw

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Michael E. Farbiarz
Plaintiff,	:	Civil Case No. 24-5863
v.	:	DECLARATION OF JACLYN N.
THE CONTENTS OF THE	:	WYRWAS REGARDING
FOLLOWING ACCOUNTS:	:	DIRECT NOTICE
	:	
JP MORGAN CHASE ACCOUNT	:	
ENDING IN 9483 IN THE NAME OF	:	
JAE CHOI ATTORNEY TRUST	:	
ACCOUNT, et al.	:	
Defendants <i>in rem</i> .	:	

Jaclyn N. Wyrwas, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a senior law clerk in the Asset Recovery and Money Laundering Unit, a contract employee, in the Office of the United States Attorney for the District of New Jersey.
2. I make this Declaration in order to detail the United States of America's efforts to send notice of the above-captioned civil forfeiture action to potential claimants, in accordance with Rule G(4)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.
3. On or about May 6, 2024, the United States of America filed a Verified Complaint for Forfeiture *in Rem* (ECF Doc. 1, hereinafter referred to as the "Verified Complaint") seeking forfeiture, pursuant to 18 U.S.C. §§

981(a)(1)(C) and 981(a)(1)(A), in the United States District Court for the District of New Jersey, against the following property:

- a. The contents of an account at JP Morgan Chase ending in 9483 in the name of Jae Choi Attorney Trust Account;
- b. The contents of an account at Bank of America ending in 4685 in the name of Smart Learning, Inc.;
- c. The contents of an account at JP Morgan Chase ending in 0711 in the name of Hee Ah Nam;
- d. The contents of an account at TD Bank ending in 2483 in the name of Hee Ah Nam;
- e. The contents of an account at TD Bank ending in 1237 in the name of Hee Ah Nam;
- f. The contents of an account at Bank of America ending in 6030 in the name of Hee Ah Nam;
- g. The contents of an account at Bank of America ending in 6043 in the name of Hee Ah Nam;
- h. The contents of an account at JP Morgan Chase ending in 9900 in the name of Hudson Asset Holding Corp;
- i. The contents of an account at JP Morgan Chase ending in 4413 in the name of Hudson Asset Holding Corp;
- j. The contents of an account at JP Morgan Chase ending in 0353 in the name of Virtua Education, Inc.;
- k. The contents of an account at JP Morgan Chase ending in 4827 in the name of Virtua Education, Inc.;
- l. The contents of an account at TD Ameritrade ending in 2857 in the name of Hee Ah Nam; and
- m. The real property located at 125 13th Street, Cresskill, New Jersey

(collectively, the “defendant property”).

4. On May 8, 2024, the United States filed a Notice of Complaint for Forfeiture with regard to the defendant property. (ECF Doc. 4). The Notice of Complaint for Forfeiture explained the procedures for filing a claim to assert an interest in the defendant property.

5. According to the records and files of the United States Attorney's Office, on or about May 29, 2024, copies of the Notice of Complaint for Forfeiture and the Verified Complaint were sent by Federal Express to Virtua Education, Inc., c/o Legalinc Corporate Services Inc., 131 Continental Drive, Suite 305, Newark, Delaware 19713. The cover letter, dated May 29, 2024, stated that a claim asserting an interest in the defendant property had to be filed no later than July 3, 2024, *i.e.*, 35 days after the date of the cover letter. Copies of the notice letter and proof of delivery are attached hereto as Exhibit A.


6. According to the records and files of the United States Attorney's Office, on or about May 29, 2024, copies of the Notice of Complaint for Forfeiture and the Verified Complaint were sent by Federal Express to Smart Learning Inc., c/o Legalinc Corporate Services Inc., 131 Continental Drive, Suite 305, Newark, Delaware 19713. The cover letter, dated May 29, 2024, stated that a claim asserting an interest in the defendant property had to be filed no later than July 3, 2024, *i.e.*, 35 days after the date of the cover letter. Copies of the notice letter and proof of delivery are attached hereto as Exhibit B.

7. According to the records and files of the United States Attorney's Office, on or about May 29, 2024, copies of the Notice of Complaint for Forfeiture and the Verified Complaint were sent by Federal Express to Hudson Asset Holding Corp., c/o Legalinc Corporate Services Inc., 301 Route 17 North, Suite 800, #12-40, Rutherford, New Jersey 07070. The cover letter, dated May 29, 2024, stated that a claim asserting an interest in the defendant property had to be filed no later than July 3, 2024, *i.e.*, 35 days after the date of the cover letter. Copies of the notice letter and proof of delivery are attached hereto as Exhibit C.

8. According to the records and files of the United States Attorney's Office, on or about June 20, 2024, copies of the Notice of Complaint for Forfeiture and the Verified Complaint were sent by Federal Express and electronic mail to Hee Ah Nam a/k/a Iris Choi, c/o Joseph R. Donahue, Esq., Joseph R. Donahue, LLC, 135 Prospect Street, Ridgewood, New Jersey 07450, [jdonahue@donahuenjlaw.com](mailto:jdonahue@donahuenjlaw.com). The cover letter stated that a claim asserting an interest in the defendant property had to be filed no later than 35 days of the date of the cover letter (*i.e.*, July 25, 2024). Copies of the notice letter, the email to counsel and proof of Federal Express delivery are attached hereto as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 19, 2024

  
Jaclyn N. Wyrwas